

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:13-cr-58 HEA (SPM)
)	
JEFFREY ELLERBECK,)	
)	
Defendant.)	

FIRST MOTION TO TRAVEL

COMES NOW Defendant, Jeffrey Ellerbeck, by and through counsel, and files the following motion to travel from Denver, Colorado to Omaha, Nebraska from December 22, 2013 to December 26, 2013. In support of this motion, Defendant states as follows:

1. Defendant hopes to travel from St. Louis, Missouri to Omaha, Nebraska over the upcoming holidays.
2. If permitted to travel, Defendant will leave Denver, Colorado on December 22, 2013 and return to Denver on December 26, 2013.
3. If permitted to travel, Defendant will stay with his mother at 1105 N. 93rd Street, Omaha, Nebraska 68114 and share the holidays with her.
4. If permitted to travel, Defendant will contact his pretrial services officer, as directed, while outside the District of Colorado.
5. Defendant has been on bond since February 1, 2013 and has incurred no violations in that time.
6. Defendant, through counsel, has discussed this matter with assistant United States

attorney Stephen Casey. Mr. Casey does not object to Defendant's request.

7. Defendant, through counsel, has also discussed this matter with pretrial services officer Dee Clark from the District of Colorado. Ms. Clark also has no objection to Defendant's request.

WHEREFORE, Defendant respectfully request this Honorable Court permit him to travel from Denver, Colorado to Omaha, Nebraska from December 22, 2013 to December 26, 2013.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2013, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Stephen Casey, assistant United States attorney.